EXHIBIT K

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1	
1	IN THE UNITED STATES DISTRICT COURT
2	FOR THE SOUTHERN DISTRICT OF TEXAS
3	HOUSTON DIVISION
4	x
5	
6	In re ANADARKO PETROLEUM Civil Action No.
	CORPORATION SECURITIES 4:20-cv-00576
7	LITIGATION
8	
9	x
10	
11	**CONFIDENTIAL**
12	
13	REMOTE VIDEOTAPED DEPOSITION BY VIRTUAL ZOOM OF
14	LEA FRYE
15	Friday, October 7, 2022
16	
17	
18	
19	
20	
21	
22	
23	Reported By: Lynne Ledanois, CSR 6811
24	Job No. 142789
25	
	Page 1

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1	IN THE UNITED STATES DISTRICT COURT	1	REMOTE APPEARANCES
2	FOR THE SOUTHER DISTRICT OF TEXAS	2	
3	HOUSTON DIVISION	3	Counsel for the Defendants:
4	X	4	CRAVATH, SWAINE & MOORE LLP
5		5	BY: LAUREN ROSENBERG
6	In re ANADARKO PETROLEUM Civil Action No.	6	BENJAMIN WYLLY
	CORPORATION SECURITIES 4:20-cv-00576	7	CHARLES P. BLOOM
7	LITIGATION	8	Attorneys at Law
8		9	Worldwide Plaza
9	X		
10		10	825 Eighth Avenue
11		11	New York, New York 10019
12	Videotaped deposition of LEA FRYE, taken	12	lrosenberg@cravath.com
	in Helena, Montana, commencing at 10:11 a.m. Central		-and-
	on Friday, October 7, 2022 before Lynne Ledanois,		Counsel for the Defendants:
	Certified Shorthand Reporter No. 6811	15	SHIPLEY SNELL MONTGOMERY LLP
16		16	BY: GEORGE SHIPLEY
17		17	Attorney at Law
18		18	712 Main Street
19		19	Suite 1400
20		20	Clutch City, Texas 77002
21		21	gshipley@shipleysnell.com
22		22	
23		23	
24		24	
25		25	///
23	Page 2	25	Page 4
-			6
		l .	
1	REMOTE APPEARANCES	1	REMOTE APPEARANCES
1 2	REMOTE APPEARANCES	2	
2	REMOTE APPEARANCES Counsel for the Lead Plaintiffs:		REMOTE APPEARANCES Counsel for the Witness:
2		2	
3	Counsel for the Lead Plaintiffs:	2 3	Counsel for the Witness:
2 3 4	Counsel for the Lead Plaintiffs: ROBBINS GELLER RUDMAN & DOWD LLP	2 3 4	Counsel for the Witness: MINCES RANKIN PLLC
2 3 4 5	Counsel for the Lead Plaintiffs: ROBBINS GELLER RUDMAN & DOWD LLP BY: RACHEL JENSEN	2 3 4 5	Counsel for the Witness: MINCES RANKIN PLLC BY: DAVID MINCES
2 3 4 5 6	Counsel for the Lead Plaintiffs: ROBBINS GELLER RUDMAN & DOWD LLP BY: RACHEL JENSEN MEGAN A. ROSSI	2 3 4 5 6	Counsel for the Witness: MINCES RANKIN PLLC BY: DAVID MINCES Attorney at Law
2 3 4 5 6 7	Counsel for the Lead Plaintiffs: ROBBINS GELLER RUDMAN & DOWD LLP BY: RACHEL JENSEN MEGAN A. ROSSI RAPHAELLA FRIEDMAN FRANCISCO MEJIA	2 3 4 5 6 7 8	Counsel for the Witness: MINCES RANKIN PLLC BY: DAVID MINCES Attorney at Law 4545 Bissonnet Street Suite 286
2 3 4 5 6 7 8 9	Counsel for the Lead Plaintiffs: ROBBINS GELLER RUDMAN & DOWD LLP BY: RACHEL JENSEN MEGAN A. ROSSI RAPHAELLA FRIEDMAN FRANCISCO MEJIA Attorneys at Law	2 3 4 5 6 7 8 9	Counsel for the Witness: MINCES RANKIN PLLC BY: DAVID MINCES Attorney at Law 4545 Bissonnet Street Suite 286 Bellaire, Texas 77401
2 3 4 5 6 7 8 9	Counsel for the Lead Plaintiffs: ROBBINS GELLER RUDMAN & DOWD LLP BY: RACHEL JENSEN MEGAN A. ROSSI RAPHAELLA FRIEDMAN FRANCISCO MEJIA Attorneys at Law 655 West Broadway	2 3 4 5 6 7 8 9 10	Counsel for the Witness: MINCES RANKIN PLLC BY: DAVID MINCES Attorney at Law 4545 Bissonnet Street Suite 286
2 3 4 5 6 7 8 9 10	Counsel for the Lead Plaintiffs: ROBBINS GELLER RUDMAN & DOWD LLP BY: RACHEL JENSEN MEGAN A. ROSSI RAPHAELLA FRIEDMAN FRANCISCO MEJIA Attorneys at Law 655 West Broadway Suite 1900	2 3 4 5 6 7 8 9 10	Counsel for the Witness: MINCES RANKIN PLLC BY: DAVID MINCES Attorney at Law 4545 Bissonnet Street Suite 286 Bellaire, Texas 77401
2 3 4 5 6 7 8 9 10 11 12	Counsel for the Lead Plaintiffs: ROBBINS GELLER RUDMAN & DOWD LLP BY: RACHEL JENSEN MEGAN A. ROSSI RAPHAELLA FRIEDMAN FRANCISCO MEJIA Attorneys at Law 655 West Broadway Suite 1900 San Diego, California 92101	2 3 4 5 6 7 8 9 10 11 12	Counsel for the Witness: MINCES RANKIN PLLC BY: DAVID MINCES Attorney at Law 4545 Bissonnet Street Suite 286 Bellaire, Texas 77401
2 3 4 5 6 7 8 9 10 11 12 13	Counsel for the Lead Plaintiffs: ROBBINS GELLER RUDMAN & DOWD LLP BY: RACHEL JENSEN MEGAN A. ROSSI RAPHAELLA FRIEDMAN FRANCISCO MEJIA Attorneys at Law 655 West Broadway Suite 1900 San Diego, California 92101 rjensen@rgrdlaw.com	2 3 4 5 6 7 8 9 10 11 12 13	Counsel for the Witness: MINCES RANKIN PLLC BY: DAVID MINCES Attorney at Law 4545 Bissonnet Street Suite 286 Bellaire, Texas 77401 david@mincesrankin.com
2 3 4 5 6 7 8 9 10 11 12 13 14	Counsel for the Lead Plaintiffs: ROBBINS GELLER RUDMAN & DOWD LLP BY: RACHEL JENSEN MEGAN A. ROSSI RAPHAELLA FRIEDMAN FRANCISCO MEJIA Attorneys at Law 655 West Broadway Suite 1900 San Diego, California 92101 rjensen@rgrdlaw.com -and-	2 3 4 5 6 7 8 9 10 11 12 13 14	Counsel for the Witness: MINCES RANKIN PLLC BY: DAVID MINCES Attorney at Law 4545 Bissonnet Street Suite 286 Bellaire, Texas 77401 david@mincesrankin.com
2 3 3 4 4 5 6 6 7 8 8 9 10 11 12 13 14 15	Counsel for the Lead Plaintiffs: ROBBINS GELLER RUDMAN & DOWD LLP BY: RACHEL JENSEN MEGAN A. ROSSI RAPHAELLA FRIEDMAN FRANCISCO MEJIA Attorneys at Law 655 West Broadway Suite 1900 San Diego, California 92101 rjensen@rgrdlaw.com -and- KENDELL LAW GROUP PLLC	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Counsel for the Witness: MINCES RANKIN PLLC BY: DAVID MINCES Attorney at Law 4545 Bissonnet Street Suite 286 Bellaire, Texas 77401 david@mincesrankin.com ALSO PRESENT: David Halvorson, Videographer
2 3 3 4 5 6 7 7 8 9 10 11 12 13 14 15 16	Counsel for the Lead Plaintiffs: ROBBINS GELLER RUDMAN & DOWD LLP BY: RACHEL JENSEN MEGAN A. ROSSI RAPHAELLA FRIEDMAN FRANCISCO MEJIA Attorneys at Law 655 West Broadway Suite 1900 San Diego, California 92101 rjensen@rgrdlaw.com -and- KENDELL LAW GROUP PLLC BY: JOE KENDALL	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Counsel for the Witness: MINCES RANKIN PLLC BY: DAVID MINCES Attorney at Law 4545 Bissonnet Street Suite 286 Bellaire, Texas 77401 david@mincesrankin.com ALSO PRESENT: David Halvorson, Videographer Kallie Gallagher, In-House Counsel Occidental
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Counsel for the Lead Plaintiffs: ROBBINS GELLER RUDMAN & DOWD LLP BY: RACHEL JENSEN MEGAN A. ROSSI RAPHAELLA FRIEDMAN FRANCISCO MEJIA Attorneys at Law 655 West Broadway Suite 1900 San Diego, California 92101 rjensen@rgrdlaw.com -and- KENDELL LAW GROUP PLLC BY: JOE KENDALL Attorney at Law	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Counsel for the Witness: MINCES RANKIN PLLC BY: DAVID MINCES Attorney at Law 4545 Bissonnet Street Suite 286 Bellaire, Texas 77401 david@mincesrankin.com ALSO PRESENT: David Halvorson, Videographer
2 3 3 4 5 6 7 7 8 9 10 11 12 13 13 14 15 16 17 18	Counsel for the Lead Plaintiffs: ROBBINS GELLER RUDMAN & DOWD LLP BY: RACHEL JENSEN MEGAN A. ROSSI RAPHAELLA FRIEDMAN FRANCISCO MEJIA Attorneys at Law 655 West Broadway Suite 1900 San Diego, California 92101 rjensen@rgrdlaw.com -and- KENDELL LAW GROUP PLLC BY: JOE KENDALL Attorney at Law 3811 Turtle Creek Boulevard	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Counsel for the Witness: MINCES RANKIN PLLC BY: DAVID MINCES Attorney at Law 4545 Bissonnet Street Suite 286 Bellaire, Texas 77401 david@mincesrankin.com ALSO PRESENT: David Halvorson, Videographer Kallie Gallagher, In-House Counsel Occidental
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2 3 4 5 6 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Counsel for the Lead Plaintiffs: ROBBINS GELLER RUDMAN & DOWD LLP BY: RACHEL JENSEN MEGAN A. ROSSI RAPHAELLA FRIEDMAN FRANCISCO MEJIA Attorneys at Law 655 West Broadway Suite 1900 San Diego, California 92101 rjensen@rgrdlaw.com -and- KENDELL LAW GROUP PLLC BY: JOE KENDALL Attorney at Law 3811 Turtle Creek Boulevard Suite 1450	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Counsel for the Witness: MINCES RANKIN PLLC BY: DAVID MINCES Attorney at Law 4545 Bissonnet Street Suite 286 Bellaire, Texas 77401 david@mincesrankin.com ALSO PRESENT: David Halvorson, Videographer Kallie Gallagher, In-House Counsel Occidental
2 3 3 4 5 6 7 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Counsel for the Lead Plaintiffs: ROBBINS GELLER RUDMAN & DOWD LLP BY: RACHEL JENSEN MEGAN A. ROSSI RAPHAELLA FRIEDMAN FRANCISCO MEJIA Attorneys at Law 655 West Broadway Suite 1900 San Diego, California 92101 rjensen@rgrdlaw.com -and- KENDELL LAW GROUP PLLC BY: JOE KENDALL Attorney at Law 3811 Turtle Creek Boulevard Suite 1450 Dallas, Texas 75219	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Counsel for the Witness: MINCES RANKIN PLLC BY: DAVID MINCES Attorney at Law 4545 Bissonnet Street Suite 286 Bellaire, Texas 77401 david@mincesrankin.com ALSO PRESENT: David Halvorson, Videographer Kallie Gallagher, In-House Counsel Occidental
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2 3 4 5 6 7 8 9 100 111 122 13 144 155 166 177 188 199 20 21 22	Counsel for the Lead Plaintiffs: ROBBINS GELLER RUDMAN & DOWD LLP BY: RACHEL JENSEN MEGAN A. ROSSI RAPHAELLA FRIEDMAN FRANCISCO MEJIA Attorneys at Law 655 West Broadway Suite 1900 San Diego, California 92101 rjensen@rgrdlaw.com -and- KENDELL LAW GROUP PLLC BY: JOE KENDALL Attorney at Law 3811 Turtle Creek Boulevard Suite 1450 Dallas, Texas 75219	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Counsel for the Witness: MINCES RANKIN PLLC BY: DAVID MINCES Attorney at Law 4545 Bissonnet Street Suite 286 Bellaire, Texas 77401 david@mincesrankin.com ALSO PRESENT: David Halvorson, Videographer Kallie Gallagher, In-House Counsel Occidental
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2 record at 11:42 a.m. Go ahead, please. 3 BY MS. JENSEN: 4 Q Okay. Ms. Frye, you should be able to see 5 in your Exhibit Share a document that has been 11:42AM 6 marked as Exhibit 254. It is the native version of 7 a document previously marked as 254 I'm sorry, 8 this has been marked as 254A. It is the native 9 version of prior Exhibit 254. 10 (Exhibit 254A was marked for identification 11:42AM 11 by the court reporter.) 11 MS. JENSEN: For the record, it bears 12 MS. JENSEN: For the record, it bears 13 A Yes. 14 Q Are you able to see this document? 14 Q I want to show you what's been marked as 15 Exhibit 347. 11:47AM 16 Q And do you recognize this document? 16 (Exhibit 347 was marked for identification 17 by the court reporter.) 18 just one page? Hold on. 19 Okay. I hit the wrong button. 19 Okay. I hit the wrong button. 20 Yes, I recognize this as a document that I 11:43AM 21 would have worked on. 22 Q And does this appear to be a true and 23 accurate copy of the presentation that you made at 24 the February 19th, 2014 meeting that we were 25 discussing before the break? 11:44AM 22 what you use, tar. Same concept, very sticky. 3 Q Can that be problematic for an oil 4 prospect? 3 Q Can that be problematic for an oil 4 prospect? 4 prospect? 5 A Yes, it can be. 11:46AM 66 Q Why is that? 7 A This tar-like substance can plug your access 8 to the reservoir as in the perforations that allow the 9 flow and the pore space itself near the wellbore that 10 allows the hydrocarbon to flow into the well to 11:46AM 11 ultimately come to the surface. 12 Q And could it impact the recovery? 13 A Yes. 14 Q I want to show you what's been marked as 15 Exhibit 347. 11:47AM 16 (Exhibit 347 was marked for identification 17 by the court reporter.) 18 MS. JENSEN: For the record, this bears 19 the Bates stamp APC-00604655. 20 THE WITNESS: Sorry, can you repeat the 11:47AM 21 APC number to make sure I have the right one? 22 BY MS. JENSEN: 23 Q Sure. Number 1, do you see the exhibit 24 the February 19th, 2014 meeting that we were 2		
3 Q Can that be problematic for an oil 4 prospect? 5 in your Fishith Share a document that has been 6 marked as Eshibit 254. It is the native version of 7 a document previously marked as 254 – I'm sorry, 8 this has been marked as 254 – I'm sorry, 9 version of prior Eshibit 254. 10 (Exhibit 254. It is the native 9 version of prior Eshibit 254. 11 by the court reporter.) 12 MS, JENSEN: For the record, it bears 13 Bates stump APC-01674681. 14 Q Are you able to see this document? 15 A Yes, I am. 11-33AM 16 Q And do you recognize this document? 17 A Let me look through it real quick. Is there 18 just one page? Hold on. 19 Okay. I hit the wrong button. 20 Yes, I recognize this as a document that I 11:43AM 21 would have worked on. 22 Q And does this appear to be a true and 23 accurate copy of the presentation that you made at 24 the February 19th, 2014 meeting that we were 25 discussing before the break? 11 A I honestly would not recall which meeting I 11:44AM 2 would have presented this at s I made and presented 3 lost of meetings over that time frame, probably in the 4 hundreds. The time frame, Probably in the	1 THE VIDEOGRAPHER: We're back on the 11:42AM	1 in the industry, but it is in concept of layman's term 11:46AM
4 prospect? 5 in your Exhibit Share a document that has been 11:42AM 6 marked as Exhibit 23-4. It is the native version of 7 a document previously marked as 254 - 1'm sorry, 8 this has been marked as 254 - 1'm sorry, 8 this has been marked as 254 - 1'm sorry, 8 this has been marked as 254 - 1'm sorry, 8 this has been marked as 254 - 1'm sorry, 10 (Exhibit 254 was marked for identification 11:42AM 11 by the court reporter.) 11 (Exhibit 254 was marked for identification 11:42AM 11 by the court reporter.) 12 MS_INSENEN: For the record, it bears 12 MS_INSENEN: For the record, it bears 13 A Yes. 13 Bates stamp APC-01674681. 14 Q Are you able to see this document? 15 A Yes, I am. 11:43AM 15 Exhibit 347. May our recognize this document? 16 Q And do you recognize this document? 17 A Let me look through it real quick. Is there 18 just one page? Hold on. 19 Okay. I hit the wrong button. 10 Q And does this appear to be a true and 23 accurate copy of the presentation that you made at 24 the February 19th, 2014 meeting that we were 25 discussing before the break? 11:44AM 2 would have presented this at as I made and presented 3 lots of meetings over that time frame, probably in the 4 hundreds. The time frame, probably in the 12 February 19th, 2014 meeting that we were discussing? 13 A No, sounds like this is correct. 19 Do you continued to work throughout the 12 February 19th, 2014 meeting that we were discussing? 13 A No, sounds like this is correct. 19 Do you continued to work throughout the 12 February 19th, 2014 meeting that we were discussing? 13 A No, sounds like this is correct. 19 Q A No was tar a risk at the time? 11:45AM 16 Q No Ay. You can set that aside. 15 A Okay. 11:45AM 16 Q No Ay. You can set that aside. 16 Q O Ay. You can set that aside. 17 spring o	2 record at 11:42 a.m. Go ahead, please.	2 what you use, tar. Same concept, very sticky.
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7 a document previously marked as 254 – I'm sorry, 8 this has been marked as 254 – I'm sorry, 9 this has been marked as 254 – I'm sorry, 10 (Eshibit 254. Was marked for identification 11:42AM 11 by the court reporter, 11 by the court reporter, 12 MS. JENSEN: For the record, it bears 13 Bates stamp APC-01674681. 14 Q Are you able to see this document? 15 A Yes, I am. 11 43AM 16 Q And doy you recognize this document? 17 A Let me look through it real quick. Is there 18 just one page? Hold on. 19 Okay. I hit the wrong button. 20 Yes, I recognize this as a document that I 11:43AM 21 would have worked on. 22 Q And does this appear to be a true and 23 accurate copy of the presentation that you made at 24 the February 19th, 2014 meeting that we were 25 discussing before the break? 11 A I honestly would not recall which meeting I 11:44AM 2 would have presented this at as I made and presented 3 lots of meetings over that time frame, probably in the 4 hundreds. The time frame, I'm not sure. 5 Q I can represent to you that my 11:44AM 4 hundreds. The time frame, I'm not sure. 5 Q I can represent to you that my 11:44AM 6 understanding is the metadata on this document is 7 dated February 19th, 2014. 8 A All right. Then sounds like this is the 9 one. 10 Q So you don't have any reason to doubt that 11:44AM 11 this was the presentation that you made at the 12 February 19th, 2014 meeting that we were discussing? 13 A No, sounds like this is correct. 14 Q Okay. You can set that aside. 15 A Okay. 11 Hay Master a risk at the time? 11 A Promise of 2014 to understanding is the metadata on this document is 10 Q So you continued to work throughout the 11 Hay Master a risk at the time? 11 Hay Master a risk at the time? 12 Hay Master a risk at the time? 13 Pat McGrievy, a fellow engineer in the Foldbelt Team, 14 Parall Mercompany. 15 A Pea. 16 Let micrompanies, which is ConcooPhillips.	5 in your Exhibit Share a document that has been 11:42AM	5 A Yes, it can be. 11:46AM
8 to the reservoir as in the perforations that allow the 9 version of prior Exhibit 254. (8 (Exhibit 254A was marked for identification 11:42AM 11 by the court reporter.) (9 (MS. JENSEN: For the record, it bears 12 MS. JENSEN: For the record, it bears 12 Q And could it impact the recovery? 13 A Ves. 14 Q I want to show you what's been marked as 11:45AM 15 Exhibit 347. (14 Q Ard you able to see this document? 14 Q I want to show you what's been marked as 15 Exhibit 347. 11:47AM 15 Exhibit 347. 11:47AM 15 Exhibit 347. 11:47AM 15 Exhibit 347. 11:47AM 16 Q And do you recognize this document? 18 Just one page? Hold on. 19 Okay. I hit the wrong button. 19 Okay. Of the presentation that you made at 24 the February 19th, 2014 meeting that we were 25 discussing before the break? 11:44AM 2 would have presented this at as I made and presented 3 lots of meetings over that time frame, probably in the 4 hundreds. The time frame, probably in the 4 hundreds. The time frame, probably in the 4 hundreds. The time frame, probably in the 5 Q I can represent to you that my 11:44AM 2 this was the presentation that you made at the 12 February 19th, 2014 meeting that we were discussing? 10 Q So you don't have any reason to doubt that 11:44AM 11 this was the presentation that you made at the 12 February 19th, 2014 meeting that we were discussing? 13 A No, sounds like this is orrect. 14 Q Okay. Wou can set that aside. 15 A Okay. 15 A Yes. 11:45AM 16 Q So you continued to work throughout the 17 spring of 2014 to understand the risks associated 18 with Shenandoah; is that fair? 19 A Yes, that's fair. 11:45AM 21 and the fair fair. 21:45AM 22 Q A Maw was tra risk at the time? 11:45AM 21 and the fair fair. 21:45AM 22 Q A Dan Bradley? 20 A Dan Bradley? 20 A Dan Bradley? 21 partner companies, which is ConocoPhillips.	6 marked as Exhibit 254. It is the native version of	6 Q Why is that?
9 flow and the pore space itself near the wellbore that 10 (Exhibit 254A was marked for identification 11:42AM 11 by the court reporter.) 12 MS_JENSEN: For the record, it bears 12 Q And could it impact the recovery? 13 Bates stamp APC-01674681. 13 A Yes. 14 Q I want to show you what's been marked as 15 Exhibit 347. 11:47AM 16 Q And do you recognize this document? 16 (Exhibit 347 was marked for identification 17 A Let me look through it real quick. Is there 18 just one page? Hold on. 19 Okay. I hit the wrong button. 19 Okay. I hit the wrong button 19 Okay. I h	7 a document previously marked as 254 I'm sorry,	7 A This tar-like substance can plug your access
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22 Y 50 Conocor minps was a particular company		
23 Q Is that the same as asphaltene, or is that 23 on the Shenandoah project?		
24 something different? 24 A Yes, they were.	•	
25 A Asphaltene is the more technical term used 11:46AM 25 Q And do you recall a discussion around this 11:49AM		
	*	Page 57

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1 time about the impact or potential impact of 11:49AM	1 asphaltene. If that's the case, we might have the 11:53AM
2 asphaltene on the recovery rates?	2 worst of all possible fluids: High asphaltene weight
3 A Yes, I do.	3 percentage and light oils. Thanks."
4 Q And Dan from ConocoPhillips was seeing a	4 Q So is that consistent with your
5 loss of approximately a third of the recovery due to 11:49AM	5 recollection at the time that Anadarko and its 11:53AM
6 the asphaltenes?	6 partners were finding that there were problems with
7 MS. ROSENBERG: Objection to form.	7 the fluids in Shenandoah?
8 THE WITNESS: I need to read here to see	8 A Yes. That's consistent, yes.
9 if he actually stated that.	9 Q Could you elaborate on that? What was the
10 BY MS. JENSEN: 11:50AM	10 problem? 11:53AM
11 Q So I'm looking at his February 20th, 2014,	11 A The potential to have to abandon the
12 8:08 a.m. email.	12 reservoir at an earlier date than anticipated due to
13 A Yes, it does say he was seeing a third of	13 asphaltene dropping out, which results in a lower
	14 recovery factor overall the entire reservoir.
14 the recovery in Paragraph 3.	
15 Q And he also relayed that the asphaltene 11:50AM	In addition, potential for extra costs 11:54AM
16 onset pressures were higher than anything	16 associated with trying to treat and abate the
17 ConocoPhillips had seen before?	17 asphaltenes in the well based on experiences we had
18 A Yes, he did state that earlier.	18 had with other wells in the Gulf of Mexico.
19 Q Was that consistent with your views that	19 Q And did all of that add up to mean that
20 are the asphaltene onset pressures were very high in 11:51AM	20 the asphaltene was a drag on the economics for 11:54AM
21 Shenandoah?	21 Shenandoah?
22 A Yes.	22 MS. ROSENBERG: Objection to form.
23 MS. ROSENBERG: Objection, form.	23 THE WITNESS: It was identified as one of
24 THE WITNESS: Yes, they were high compared	24 the potential risk factors we needed to understand
25 to what I had seen in the past. 11:51AM	25 better at that time with additional analysis of 11:54AM
Page 58	Page 60
1 BY MS. JENSEN: 11:51AM	1 fluids. 11:54AM
2 Q If you scroll up to higher in the chain,	2 BY MS. JENSEN:
3 which of course is later in time, there is an email	3 Q And did it result in the implication that
4 from Brad Browning on February 24th at 3:33 p.m.	4 water injection wells may be required as part of the
5 Do you see that email? 11:51AM	5 base case 11:55AM
6 A Yes, I do.	
	6 MS. ROSENBERG: Objection.
7 O Who's Brad Browning?	6 MS. ROSENBERG: Objection. 7 BY MS. JENSEN:
7 Q Who's Brad Browning? 8 A Brad Browning was a senior above	7 BY MS. JENSEN:
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1 Q And by including that, that would be the 11:56AM	
2 capital cost for water injection; right?	2 Q Could you elaborate on what that means?
3 A Correct.	3 A When you commingle in a wellbore, you would
4 Q Asphaltene continued to be problematic	4 take multiple zones and complete them and then allow
5 throughout the project; is that fair? 11:57AM	5 those to flow together within that wellbore and 12:01PM
6 A Correct.	6 produce it to the surface rather than doing one zone
7 MS. JENSEN: I'm going to mark another	7 by itself.
8 exhibit.	8 And those fluids would mix in that
9 (Exhibit 348 was marked for identification	9 wellbore as they came together.
10 by the court reporter.) 11:57AM	10 Q Would isolating each zone for production 12:01PM
MS. JENSEN: You should be able to see	11 have a negative impact on Shenandoah's economics?
12 what's been marked as Exhibit 348.	MS. ROSENBERG: Objection to form.
For the record, this is APC-00052392.	13 THE WITNESS: Yes, isolating individual
14 THE WITNESS: Yes, I see it.	14 zones would have a significant impact by one of two
15 BY MS. JENSEN: 11:57AM	15 factors. One way to handle it would be drill 12:01PM
16 Q Do you recognize this document?	16 individual wells for every zone and there was
17 A This is an email chain, again.	17 significant number of zones.
18 Q Does this appear to be a true and accurate	18 I would have to have a document in front
19 copy of an email chain between yourself and Nikhil	19 of me to remind me exactly how many zones, but I
20 Joshi at Anadarko in October of 2015? 11:58AM	20 want to say we had the upper Wilcox 1, 2 and 3 and I 12:02PM
21 A Yes.	21 want to say it was a lower Wilcox A, B, C, D and E,
22 Q And on October 22nd, 2015, you write,	22 which would be eight. I would have to verify that
23 "Ugh. Not good news."	23 with a document, but that's my recollection on the
What is the not good news that you're	24 zones.
25 referring to in your email? 11:58AM Page 62	25 And drilling eight individual wells would 12:02PM Page 64
1 A Upon knowing asphaltenes was an individual 11:59AM	1 not work for every single drainage area across the 12:02PM
2 reservoir issue with this particular project and I say	2 field.
3 that individual reservoir, meaning there was multiple	The other option you would have would be
4 reservoirs that were not communicating with each other	4 to compete each individual zone and produce it to
5 in a vertical aspect. 11:59AM	5 the end of life. And how that negatively will 12:03PM
6 And they all had slightly different	6 impact your economics is now you are getting
7 fluids. We decided to take the different fluids	7 production at a lower rate because you have one zone
8 from the different reservoirs and do additional	8 versus having more than one zone together and it
9 testing in the lab to understand what would happen	9 takes a really long time to get that production.
10 if we were to produce more than one reservoir that 11:59AM	10 So that impacts your net present value by 12:03PM
11 had different fluids together in one wellbore to	11 discounting that value of production over a really
12 understand does this impact our asphaltene dropout 13 pressures and what would that look like.	12 long time.
1	13 BY MS. JENSEN: 14 Q Was this issue discussed with management?
	14 Q Was this issue discussed with management? 15 A Yes. 12:04PM
	Q And was it ever disclosed by Anadarko to the market to your understanding?
17 individual zone by itself.	
18 I don't recall the actual numbers, but it	18 A My understanding, no. 19 Q In 2014, was faulting also a risk to the
19 was significantly higher.	
20 Q Did these results impale the viability of 12:00PM	20 Shenandoah project? 12:04PM
21 commingled production?	21 A Yes, it was.
MS. ROSENBERG: Objection to form.	MS. JENSEN: I'm going to mark an exhibit,
23 THE WITNESS: Yes, it did impair the	23 so just give me a moment here.
24	24 (F-1-1-1-240 1 15 :1 25 ::
24 potential to commingle in any one wellbore.	24 (Exhibit 349 was marked for identification
24 potential to commingle in any one wellbore. 25 Page 63	24 (Exhibit 349 was marked for identification 25 by the court reporter.) 11:33AM Page 65

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1	will be retained by Veritext Legal Solutions. 8:19PM	
2	(Proceedings concluded at 8:19 p.m.)	2 DATE OF DEPOSITION: 10/7/22
3		3 NAME OF WITNESS: Lea Frye 4 Reason codes:
		5 1. To clarify the record.
4		2. To conform to the facts.
5		6 3. To correct transcription errors.
6		7 Page Line Reason
7		Fromto
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22		21 22
23		22 23
24		24
25		25 Signature of Deponent
	Page 294	Page 2
1	LIMBEN LEDANOIC C .'C 1	
1	I, LYNNE M. LEDANOIS, a Certified	
2	Shorthand Reporter of the State of California, do	
2		
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2 3 4	Shorthand Reporter of the State of California, do hereby certify: That the foregoing proceedings were taken	
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